

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	:
Heather N. Lightle	:	Chapter 13
Thomas J. Lightle	:	Case No.: 19-16788-ELF
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, by and through the undersigned counsel, hereby move this Honorable Court to Modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Petition on October 30, 2019.
2. The Chapter 13 Plan was confirmed on March 3, 2020.
3. On June 9, 2021, an Order was entered permitting the Confirmed Chapter 13 Plan to be Modified.
4. On September 21, Creditor, Wells Fargo Bank, N.A., filed a Supplemental Proof of Claim as the debtor utilized forbearance options provided by the Creditor under the CARES Act.
5. Debtors have paid \$7,418.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$867.00 per month for the remaining 36 months for a new base amount of \$38,605.00. The Modified Plan has been attached as “Exhibit A.”

WHEREFORE, the Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Supplemental Proof of Claim filed by Wells Fargo Bank, N.A.

Dated: December 15, 2021

/s/Brad J. Sadek, Esq
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